CONCLUSION

Verizon's Application to provide interLATA service originating in Pennsylvania should

be granted.

Respectfully submitted,

Mark L. Evans Evan T. Leo Scott H. Angstreich Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C. Sumner Square. 1615 M Street, N.W. Suite 400 Washington, D.C. 20036

James G. Pachulski

(202) 326-7900

TechNet Law Group, P.C. 1100 New York Avenue, N.W. Suite 365 Washington, D.C. 20005 (202) 589-0120

Karen Zacharia Leslie A. Vial Donna M. Epps Joseph DiBella Verizon

(703) 974-2944

1320 North Court House Road Eighth Floor Arlington, Virginia 22201

Julia A. Conover Verizon Pennsylvania Inc. 1717 Arch Street 32nd Floor Philadelphia, Pennsylvania 19103 (215) 963-6001

A

.

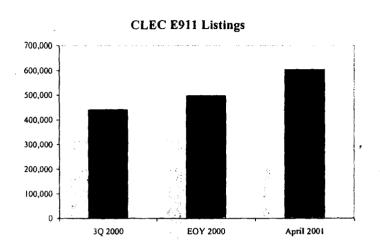
.

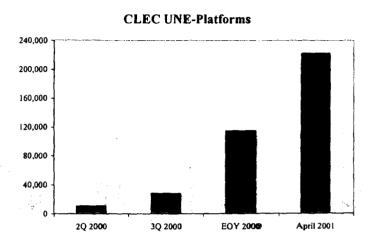
Exhibit 1. Verizon's Checklist Compliance Under the 1996 Act

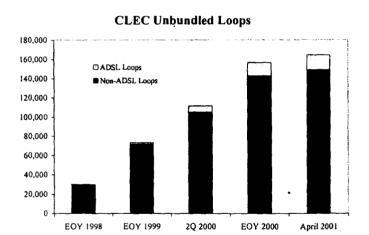
§ 271 Checklist

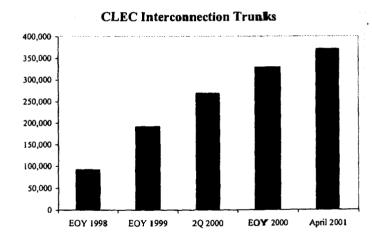
1. Interconnection	\Rightarrow	More than 370,000 trunks Approximately 2,000 collocation arrangements More than 603,000 facilities-based CLEC lines
2. Unbundled Network Elements	\Rightarrow	Approximately 387,000 unbundled loops More than 222,000 unbundled switching ports
3. Poles, Ducts, Conduits, and Rights of Way	\Rightarrow	More than 950,000 feet of conduit to 50 CLECs/OCCs More than 585,000 pole attachments (including poles and conduit provided to cable operators and other utilities in addition to CLECs) to 220 CLEC/OCCs
4. Local Loops	\Rightarrow	Approximately 387,000 total loops, including 164,000 stand-alone loops plus 222,000 loops provided as part of platforms
5. Transport	\Rightarrow	Approximately 1,400 unbundled dedicated local transport facilities More than 222,000 shared transport facilities Dark fiber arrangements with 13 CLECs
6. Switching	\Longrightarrow	More than 222,000 ports using both unbundled local and unbundled tandem switching
7. 911/E911/DA/Operator Services	\Rightarrow	Approximately 20 CLECs purchasing DA via 1,500 dedicated trunks Approximately 20 CLECs purchasing OS via 1,100 dedicated trunks Approximately 35 CLECs purchasing 911/E911 via 1,700 dedicated trunks
8. White Pages	\Rightarrow	More than 390,000 CLEC listings (excluding resale)
9. Numbering Administration	\Rightarrow	Approximately 1,900 NXX codes
10. Databases/Signaling	\Rightarrow	6 CLECs with access to signaling network
11. Number Portability	\Rightarrow	More than 660,000 numbers ported via LNP
12. Dialing Parity	\Rightarrow	Local dialing parity available throughout Pennsylvania
13. Reciprocal Compensation	\Rightarrow	Average of 2.1 billion minutes of traffic exchanged each month with 40 wireline CLECs
14. Resale	\Rightarrow	More than 164,000 total resold lines, including 128,000 business and 36,000 residential

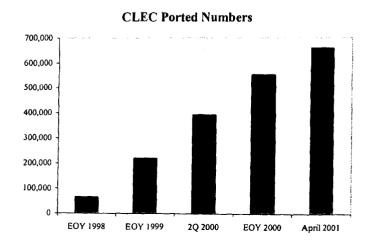
Exhibit 2. Local Competition in Pennsylvania











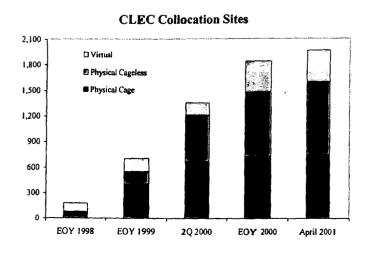
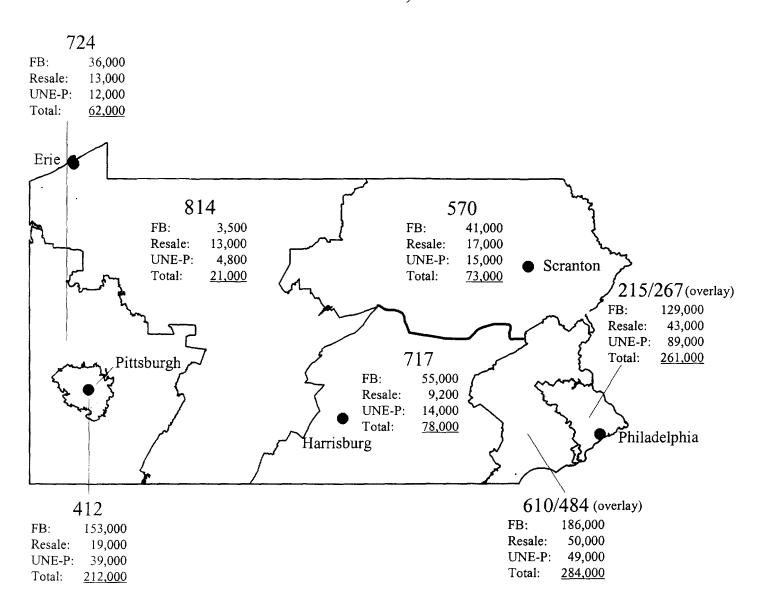


Exhibit 3. Total CLEC Lines by Area Code (Facilities-Based, Resale, and Platforms*)

Total: 990,000



^{*}Totals may not equal the sum of the parts due to rounding.

Required Statements

Pursuant to the Commission's March 23, 2001 Public Notice entitled <u>Updated Filing Requirements for Bell Operating Company Applications Under Section 271 of the Communications Act</u>, DA 01-734 (rel. March 23, 2001), Verizon states as follows:

- (a) pages i-iv of this Brief contain a table of contents;
- (b) pages 1-6 of this Brief contain a concise summary of the substantive arguments presented;
- (c) pages 7-11 of this Brief contain a statement identifying how Verizon meets the requirements of section 271(c)(1), including a list of the specific agreements on which Verizon bases its application; page 11 n.12 of this Brief describes the status of federal-court challenges to the agreements pursuant to section 252(e)(6);
- (d) pages 12-13, 80-81 of this Brief contain a statement summarizing the status of the Pennsylvania Public Utility Commission's proceeding examining Verizon's compliance with section 271;
- (e) this Brief contains all legal and factual arguments that the three requirements of section 271(d)(3) have been met, and is supported as necessary with selected excerpts from the supporting documentation (with appropriate citations): pages 7-68 address the requirements of section 271(d)(3)(A); pages 68-73 address the requirements of section 271(d)(3)(B); and pages 73-93 address the requirements of section 271(d)(3)(C));
- (f) pages iii-iv of and Attachment C to this Brief contain a list of all appendices (including declarations) and the location of and subjects covered by each of those appendices has been included;
- inquiries relating to access (subject to the terms of any applicable protective order) to any confidential information submitted by Verizon in this application should be addressed to: Steven McPherson, Verizon, 1320 North Court House Road, 8th Floor, Arlington, Virginia 22201, (703) 974-2808;
- (h) Anti-Drug Abuse Act certifications as required by 47 C.F.R. § 1.2002 are appended hereto;
- (i) certifications signed by an officer or duly authorized employee certifying that all information supplied in this application is true and accurate to the best of his or her information and belief are appended hereto.

Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
)	
Application by Verizon Pennsylvania)	
Inc. Verizon Long Distance Company,)	
Verizon Enterprise Solutions, Verizon)	CC Docket No
Global Networks Inc., and Verizon)	
Select Services Inc., for Authorization)	
To Provide In-Region, InterLATA)	
Services in Pennsylvania)	
•)	
	Ń	

DECLARATION AND VERIFICATION OF DANIEL J. WHELAN AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION OF VERIZON PENNSYLVANIA INC.

- 1. I, Daniel J. Whelan, am President Verizon Pennsylvania Inc. I am authorized to make this declaration on behalf of Verizon Pennsylvania Inc.
- 2. I have reviewed the foregoing Application by Verizon Pennsylvania Inc. for Authorization To Provide In-Region, InterLATA Services in Pennsylvania, and the materials filed in support thereof.
- 3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
- 4. I further certify that Verizon Pennsylvania Inc. is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
- 5. I declare under penalty of perjury that the foregoing is true and correct. Executed on June 1 2001. Tiesee Jellelan
 Daniel J. Whelan

Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
)	
Application by Verizon Pennsylvania)	
Inc. Verizon Long Distance Company,)	
Verizon Enterprise Solutions, Verizon)	CC Docket No.
Global Networks Inc., and Verizon)	
Select Services Inc., for Authorization)	
To Provide In-Region, InterLATA)	
Services in Pennsylvania)	
)	
)	

DECLARATION AND VERIFICATION OF MAURA C. BREEN AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION OF VERIZON LONG DISTANCE COMPANY

- I, Maura C. Breen, am President and Chief Executive Officer of Verizon Long Distance
 Company. I am authorized to make this declaration on behalf of Verizon Long Distance
 Company.
- 2. I have reviewed the foregoing Application by Verizon Pennsylvania Inc. for Authorization To Provide In-Region, InterLATA Services in Pennsylvania, and the materials filed in support thereof.
- 3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
- 4. I further certify that of Verizon Long Distance Company is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
- 5. I declare under penalty of perjury that the foregoing is true and correct. Executed on June 20, 2001.

Maura C. Breen

Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
)	
Application by Verizon Pennsylvania)	
Inc. Verizon Long Distance Company,)	
Verizon Enterprise Solutions, Verizon)	CC Docket No.
Global Networks Inc., and Verizon)	
Select Services Inc., for Authorization)	
To Provide In-Region, InterLATA)	
Services in Pennsylvania)	
·)	
	j	

DECLARATION AND VERIFICATION OF MAURA C. BREEN AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION VERIZON ENTERPRISE SOLUTIONS

- I, Maura C. Breen, am President and Chief Executive Officer Verizon Enterprise
 Solutions. I am authorized to make this declaration on behalf Verizon Enterprise Solutions.
- 2. I have reviewed the foregoing Application by Verizon Pennsylvania Inc. for Authorization To Provide In-Region, InterLATA Services in Pennsylvania, and the materials filed in support thereof.
- 3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
- 4. I further certify that Verizon Enterprise Solutions is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
- 5. I declare under penalty of perjury that the foregoing is true and correct. Executed on June 20, 2001.

Maura C. Breen

Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
)	
Application by Verizon Pennsylvania)	
Inc. Verizon Long Distance Company,)	
Verizon Enterprise Solutions, Verizon)	CC Docket No.
Global Networks Inc., and Verizon)	
Select Services Inc., for Authorization)	
To Provide In-Region, InterLATA)	
Services in Pennsylvania)	
)	
)	

DECLARATION AND VERIFICATION OF DEBRA A. KAUFMAN AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION OF VERIZON GLOBAL NETWORKS INC.

- 1. I, Debra A. Kaufman, am Chief Financial Officer, Treasurer and Secretary of Verizon Global Networks Inc. I am authorized to make this declaration on behalf of Verizon Global Networks Inc.
- 2. I have reviewed the foregoing Application by Verizon Pennsylvania Inc. for Authorization To Provide In-Region, InterLATA Services in Pennsylvania, and the materials filed in support thereof.
- 3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
- 4. I further certify that Verizon Global Networks Inc. is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
- 5. I declare under penalty of perjury that the foregoing is true and correct. Executed on June 10, 2001.

Debra A. Kaufman

Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
)	
Application by Verizon Pennsylvania)	
Inc. Verizon Long Distance Company,)	
Verizon Enterprise Solutions, Verizon)	CC Docket No.
Global Networks Inc., and Verizon)	-
Select Services Inc., for Authorization)	
To Provide In-Region, InterLATA)	
Services in Pennsylvania)	
)	
	``	

DECLARATION AND VERIFICATION OF STEVEN G. MCCULLY AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION OF VERIZON SELECT SERVICES INC.

- I, Steven G. McCully, am President Enterprise Long Distance of Verizon Select
 Services Inc. I am authorized to make this declaration on behalf of Verizon Select Services Inc.
- 2. I have reviewed the foregoing Application by Verizon Pennsylvania Inc. for Authorization To Provide In-Region, InterLATA Services in Pennsylvania, and the materials filed in support thereof.
- 3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
- 4. I further certify that Verizon Select Services Inc. is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
- 5. I declare under penalty of perjury that the foregoing is true and correct. Executed on June 20, 2001.

Steven G. McCully

DOCUMENT OFF-LINE

This page has been substituted for one of the following:

o An oversize page or document (such as a map) which was too large to be scanned into the ECFS system.

o Microfilm, microform, certain photographs or videotape.

Other materials which, for one reason or another, could not be scanned into the ECFS system.

The actual document, page(s) or materials may be reviewed by contacting an Information Technician at the FCC Reference Information Center, at 445 12th Street, SW, Washington, DC, Room CY-A257. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician.

BUR PHACIRO 11St

```
Appendix
                  Vol 1a
              Α
 Appendix
              A
                  Vol 1b
 Appendix
                  Vol 2
              A
 Appendix
              A
                  Vol 3
 Appendix
              A
                  Vol 4
Appendix
              B
                  Vol 1a
                           Tab A1-B1
 Appendix
              B
                           Tab B1 (Part b)
                  Vol 1b
 Appendix
              B
                  Vol 1c
                           Tab B1 (Part c)
 Appendix
                           Tab B1 (Part e)
              B
                  Vol 1e
 Appendix
              B
                           Tab B1 (Part d)
                  Vol 1d
 Appendix
              В
                  Vol 1f
                           Tab B1 (Part f)
 Appendix
              B
                  Vol 1g
                           Tab B1 (Part g)
 Appendix
              B
                  Vol 1h
                           Tab B1 (Part h)
 Appendix
              B
                  Vol 1I
                           Tab B1 (Part I)
· Appendix
                  Vol 1j
                           Tab B1 (Part j)
              B
 Appendix
              B
                           Tab B1 (Part k)
                  Vol 1k
              B
 Appendix
                  Vol 11
                           Tab B1 (Part 1)
 Appendix
              В
                  Vol 1m
                           Tab B1 (Part m)
 Appendix
              B
                  Vol 1n
                           Tab B1
                                   (Part n)
 Appendix
              B
                  Vol 1o
                                   (Part o)
                           Tab B1
Appendix
                           Tabs B2- B5
              B
                  Vol 2
Appendix
             \mathbf{B}
                  Vol 3
                           Tabs C1-C3
Appendix
             B
                  Vol 4
                           Tabs C4-C6
Appendix
             B
                  Vol 5
                          Tabs C7-C8
Appendix
             B
                  Vol 6
                          Tabs C9-C10
```

Appendix	В	Vol 7	Tab C11
Appendix	В	Vol 8	Tabs C12-C13
Appendix	В	Vol 9	Tabs C14-C15
Appendix	В	Vol 10	Tabs C16-C18
Appendix	В	Vol 11	Tabs C19-C20
Appendix	В	Vol 12	Tab C21
Appendix	В	Vol 13	Tab C22
Appendix	В	Vol 14	Tab C23-C24
Appendix	В	Vol 15	Tab C25-C26
Appendix	В	Vol 16	Tabs C27-28
Appendix	В	Vol 17	Tabs D1
Appendix	В	Vol 18a	Tabs 18a
Appendix	В	Vol 18b	Tabs F2-F6
Appendix	В	Vol 19	Tabs G1-H4
Appendix	\mathbf{B}	Vol 20	Tabs 11-J6
Appendix	В	Vol 21	Tabs J7-J11
Appendix	В	Vol 22	Tabs K1-M1
Appendix	В	Vol 23	Tabs N1-O8
Appendix	В	Vol 24	Tabs O9-P12
Appendix	В	Vol 25	Tabs Q1-R7
Appendix	В	Vol 26	Tabs R8-S2
Appendix	В	Vol 27	T1-AA2
Appendix	В	Vol 28	Tabs BB1-BB2
Appendix	В	Vol 29	Tab BB3
Appendix	В	Vol 29b	Tabs BB3-BB4
Appendix	В	Vol 30	Tab BB5
Appendix	В	Vol 31	Tabs BB6-BB10

Tab A Appendix \mathbf{C} Vol 1 C Tab B-C Appendix Vol 2 C Appendix Vol 3a Tab D C Appendix Vol 3b Tab D C Appendix Tab E Vol 4 C Appendix Vol 5a Tab F Appendix \mathbf{C} Vol 5b Tab F Appendix \mathbf{C} Vol 6 Tab G-H Appendix C Vol 7 Tab I-J

Brief Attachment C 4 CD ROM